
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: GUIDANT CORP. IMPLANTABLE
DEFIBRILLATORS PRODUCTS LIABILITY
LITIGATION

Lucille Banks et al.,

Plaintiff(s)

v.

Boston Scientific et al.,

Defendant(s)

MDL No. 05-1708 (DWF/AJB)

**APPLICATION TO WITHDRAW
AS COUNSEL OF RECORD**

Case No: Case No. 0:07-cv-02034

Relative to Plaintiff Jay Sayre only

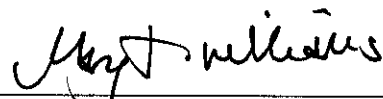
Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, the undersigned attorney hereby requests the Court and counsel that Barry Hill and Hill Williams, currently listed as counsel of record for Plaintiff Jay Sayre wish to withdraw as counsel for Plaintiff Jay Sayre in this case for the following reason(s):

Despite multiple and diligent efforts by counsel to contact client and obtain his signed release of the defendant in this matter, Plaintiff, after previously agreeing to participate in the settlement, now refuses to sign the required release and will not communicate any further with counsel. Plaintiff will not return phone calls and ignores the voice mails left for him. Plaintiff has been advised that this firm intends to withdraw from representation and still has not responded.

Please remove this firm's name as counsel for Plaintiff but allow this plaintiff to proceed "Pro Se."

A copy of this motion and the accompanying Notice of Withdrawal has been served upon Plaintiff at his home address.

Dated: 4-28-08



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CERTIFICATE OF SERVICE

Plaintiff(s)

Case No: Case No. 0:07-cv-02034

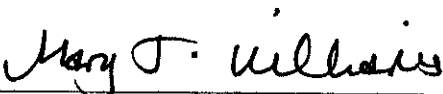
v.

Boston Scientific et al.,

Defendant(s)

I certify that copies of an **APPLICATION TO WITHDRAW AS COUNSEL OF RECORD** and a **NOTICE OF WITHDRAWAL**, were filed and served on this 28th day of April, 2008, on all counsel of record through the court's ECF service and upon the plaintiff Jay Sayre at his last known address of:

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By 
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